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**PUBLIC VERSION – REDACTED FOR PUBLIC INSPECTION**

June 16, 2014

*Electronically Filed*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: CC Docket No. 95-116; WC Docket No. 07-149; WC Docket No. 09-109

Dear Ms. Dortch:

On behalf of Neustar, Inc., and pursuant to Section 0.457 and 0.459 of the Commission's rules, I hereby submit, as attachments to this letter, information requested by the Commission staff during a June 12, 2014, meeting with attorneys representing Neustar. Neustar respectfully requests, pursuant to Section 0.459 of the Commission's rules, 47 C.F.R. § 0.459, that the Commission withhold from public inspection and afford confidential treatment to the attachments to this letter in accordance with Section 552(b)(4) of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and Section 0.457(d)(2) and 0.459(b) of the Commission's rules, 47 C.F.R. §§ 0.457(d)(2), 0.459(b).

Section 552(b)(4) of the Freedom of Information Act permits an agency to withhold from public disclosure any information that qualifies as "trade secrets and commercial or financial information obtained from a person an privileged or confidential." 5 U.S.C. § 552(b)(4). Section 0.457(d)(2) of the Commission's rules allows persons submitting materials that they wish withheld from public inspection in accordance with Section 552(b)(4) to file a request for non-disclosure. 47 C.F.R. § 0.457(d)(2). The requirements governing such requests are set forth in Section 0.459(b).

In accordance with Section 0.459 of the Commission's rules, Neustar hereby submits the following:

(1) *Identification of Specific Information for Which Confidential Treatment is Sought (Section 0.459(b)(1)).* Neustar requests confidential treatment of the attachments to this letter.

**PUBLIC VERSION – REDACTED FOR PUBLIC INSPECTION**

Ms. Marlene H. Dortch  
June 16, 2014  
Page 2

(2) *Description of Circumstances Giving Rise to Submission (Section 0.459(b)(2)).* The attachments to Neustar's letter contain information that is subject to a non-disclosure agreement; these communications have not otherwise been disclosed to Neustar's knowledge.

(3) *Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3)).* The attachments to this letter contain information that Neustar obtained under a non-disclosure agreement and that is, for that reason, commercially sensitive information that may be withheld from public disclosure under FOIA Exemption 4. The Commission has long recognized that, for purposes of Exemption 4, "records are 'commercial' as long as the submitted has a commercial interest in them." *Robert J. Butler*, 6 FCC Rcd 5414, 5415 (1991) (citing *Public Citizen Health Res. Grp. v. FDA*, 704 F.2d 1280, 1290 (D.C. Cir. 1983); *American Airlines v. National Mediation Bd.*, 588 F.2d 863, 868 (2d Cir. 1978)).

(4) *Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4)).* The attachments to this letter contain information that is subject to the competitive bidding process for the LNPA contract.

(5) *Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5)).* The attachments to this letter are confidential because they contain information obtained under a non-disclosure agreement. Neustar does not take the position that disclosure of this information would result in competitive harm to any party.

(6) *Identification of Measures Taken To Prevent Unauthorized Disclosure (Section 0.459(b)(6)).* Neustar treats the attachments to this letter as highly confidential and does not publicly disclose this information.

(7) *Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of Information to Third Parties (Section 0.459(b)(7)).* Neustar has not previously disclosed the attachments to this letter to the public.

(8) *Justification of Period During Which the Submitting Party Asserts that the Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8)).* The attachments to this letter should be released for public inspection at such time as the NAPM, LLC, consents to their disclosure.

For the foregoing reasons, Neustar respectfully requests that the Commission withhold the attachments to this letter from public inspection.

Please contact me at 202-326-7921 if you have any questions regarding this submission.

**PUBLIC VERSION – REDACTED FOR PUBLIC INSPECTION**

Ms. Marlene H. Dortch  
June 16, 2014  
Page 3

Respectfully submitted,



Aaron M. Panner  
*Counsel to Neustar, Inc.*

Attachments

**ATTACHMENT**

[INTENTIONALLY LEFT BLANK –  
CONFIDENTIAL, NOT FOR PUBLIC INSPECTION]